

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LOCAL 705 INTERNATIONAL BROTHER-)	
HOOD OF TEAMSTERS PENSION FUND,)	
)	
Plaintiff,)	CIVIL ACTION
)	
vs.)	NO. 17 C 7674
)	
P.T.O. SERVICES, INC., an Illinois corporation,)	JUDGE GARY FEINERMAN
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, P.T.O. SERVICES, INC., an Illinois corporation, in the total amount of \$2,545,623.75, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,855.25.

On November 16, 2017, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to him personally) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 8, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of December 2017:

Mr. William H. Carpenter, Registered Agent/President
P.T.O. Services, Inc.
0S415 Prince Crossing Road
West Chicago, IL 60185-3957

/s/ Patrick N. Ryan _____

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